


EXHIBIT B

U.S. Patent No. US7,650,376 v. AT&T Inc.

1. Claim Chart

Claim	Analysis
<p>[37.P] A computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network, comprising</p>	<p>AT&T (“Company”) makes, uses, sells and/or offers to sell a computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides a CDN (content delivery network) (“a computer readable storage medium or media encoded with one or more computer programs”) that facilitates a geographically distributed network of edge servers or Points of Presence (POPs) to provide immediate content access for the end users. When the user requests for the content or digital assets, the Company’s CDN service detects the software and network information about the user’s device such as smartphones and tablets, and delivers the requested content (“instructions for effecting the provision of content over a network”).</p> <div data-bbox="457 808 1312 1360">  <div data-bbox="709 816 1312 1360"> <h3>AT&T Content Delivery Network</h3> <p>Keep customers engaged with reliable access to high-quality media. Content Delivery Network (CDN) Service from AT&T gives you the bandwidth, flexibility and control you need to deliver digital assets quickly and securely. Backed by the global AT&T network, CDN Services enable you to:</p> <ul style="list-style-type: none"> • Accelerate via front-end optimization • Improve load times of dynamically loaded content • Accommodate spikes in traffic, without purchasing additional infrastructure. </div> </div>

	<p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Content Delivery Networks (CDNs) play a critical role in the seemingly immediate content access that users experience today by establishing Points of Presence (POPs) that store localized caches of content geographically nearer to end users. By hosting these large content files at the edge of the network, CDNs are also able to alleviate performance variance, core network congestion, and high operating expenses for massive data transmission.</p> <p>Source: https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, Page 9</p> <p>Accelerate content with the power of a CDN Solution.</p> <p>Content is a key business driver. Using it effectively means delivering it when and how customers want it. AT&T Content Delivery Network Service is a multi-faceted, easy-to-implement solution that accelerates the delivery of your digital assets in a variety of ways:</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Front-end optimization</p> <p>As websites have grown in complexity, so has the task of keeping them fast and responsive. AT&T Content Delivery Network caches hundreds of smaller, static assets (like images, CSS and JavaScript files) in the edge server nearest to a customer, so a user spends less time waiting to access a page.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Mobile optimization</p> <p>A CDN can optimize web experiences on smartphones and tablets. By detecting software and network information about a user's device, it can send the version of an image (or any digital asset) that best matches that device—all without sacrificing quality.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[37.1] instructions for receiving	<p>Company makes, uses, sells and/or offers to sell instructions for receiving a request from a client for specified content.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p>

<p>a request from a client for specified content</p>	<p>For example, the Company's CDN service induces the end users to request for the content such as images, videos, and web pages, and delivers the requested content to the user through the nearby edge server. Therefore, it would be apparent to a person having ordinary skill in the art that the Company's CDN service comprises instructions to receive a request from the users for specified content.</p> <p>CDN Services can help you deliver content and applications to nearly any user or device. While a CDN solution can be a powerful enhancement to your enterprise network, it also integrates well with a variety of AT&T services.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Mobile optimization</p> <p>A CDN can optimize web experiences on smartphones and tablets. By detecting software and network information about a user's device, it can send the version of an image (or any digital asset) that best matches that device—all without sacrificing quality.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>constantly caches the content between the origin and the edge servers such that when the user requests digital content, the latest content is delivered to the user through a nearby edge server.</p> <p>While CDNs significantly improve user access of static, predefined content such as videos and web pages, they are not designed to be application servers for dynamic content such as AR/VR, real-time analytics, etc. CDNs essentially operate as caches for content files that they pull from their central origin server^[vii] and are not equipped with the requisite computing infrastructure to dynamically generate content streams.^[viii]</p> <p>Source: https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, Page 9</p>
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	<p>Content Delivery Networks (CDNs) play a critical role in the seemingly immediate content access that users experience today by establishing Points of Presence (POPs) that store localized caches of content geographically nearer to end users. By hosting these large content files at the edge of the network, CDNs are also able to alleviate performance variance, core network congestion, and high operating expenses for massive data transmission.</p> <p>Source: https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, Page 9</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[37.2] instructions for communicati ng to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from</p>	<p>Company makes, uses, sells and/or offers to sell instructions for communicating to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Company's CDN comprises geographically distributed network of origin server and edge servers. When the user ("client") requests to access the specified digital content, the CDN service delivers the requested content from the edge server ("a node server having the specified content stored thereon") that is nearest to the user. Since the requested content is delivered from the nearby edge server ("enabling the client to request transmission of the specified content from the node server") to the user, upon information and belief, the identity of the nearby edge server having the specified content stored thereon is communicated to the user.</p> <p>Content Delivery Networks (CDNs) play a critical role in the seemingly immediate content access that users experience today by establishing Points of Presence (POPs) that store localized caches of content geographically nearer to end users. By hosting these large content files at the edge of the network, CDNs are also able to alleviate performance variance, core network congestion, and high operating expenses for massive data transmission.</p> <p>Source: https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, Page 9</p>

<p>the node server; and</p>	<p>Front-end optimization</p> <p>As websites have grown in complexity, so has the task of keeping them fast and responsive. AT&T Content Delivery Network caches hundreds of smaller, static assets (like images, CSS and JavaScript files) in the edge server nearest to a customer, so a user spends less time waiting to access a page.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>CDN Services can help you deliver content and applications to nearly any user or device. While a CDN solution can be a powerful enhancement to your enterprise network, it also integrates well with a variety of AT&T services.</p> <p>Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[37.3] instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission</p>	<p>Company makes, uses, sells and/or offers to sell instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission of the specified content to the client.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the CDN service delivers the requested content to the users through the nearest edge server ("the node server"). Therefore, it would be apparent for a person having ordinary skill in the art that the Company comprises instructions for ascertaining that the edge server transmitted the specified content to the client.</p> <p>Further, the Company charges the users to access the CDN services. Therefore, upon information and belief, an owner of the node server is offered an incentive as compensation for transmission of the specified content to the client.</p>

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Content Delivery Networks (CDNs) play a critical role in the seemingly immediate content access that users experience today by establishing Points of Presence (POPs) that store localized caches of content geographically nearer to end users. By hosting these large content files at the edge of the network, CDNs are also able to alleviate performance variance, core network congestion, and high operating expenses for massive data transmission.

Source: https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, Page 9

CDN Services can help you deliver content and applications to nearly any user or device. While a CDN solution can be a powerful enhancement to your enterprise network, it also integrates well with a variety of AT&T services.

Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm



AT&T Content Delivery Network

Keep customers engaged with reliable access to high-quality media. Content Delivery Network (CDN) Service from AT&T gives you the bandwidth, flexibility and control you need to deliver digital assets quickly and securely. Backed by the global AT&T network, CDN Services enable you to:

- Accelerate via front-end optimization
- Improve load times of dynamically loaded content
- Accommodate spikes in traffic, without purchasing additional infrastructure.



Source: https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm

	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
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2. List of References

1. https://www.synaptic.att.com/clouduser/html/productdetail/ATT_CDN.htm, last accessed on May 27, 2024.
2. https://about.att.com/content/dam/innovationdocs/Edge_Compute_White_Paper%20FINAL2.pdf, last accessed on May 27, 2024.